

RETURN DATE: DECEMBER 8, 2020	:	HOUSING SESSION
MAZZOLA, GUY	:	J.D. OF STAMFORD/NORWALK
v.	:	HOUSING SESSION
KINOL, TINA, ET AL	:	NOVEMBER 16, 2020

COMPLAINT

COUNT ONE

1. On or about July, 2018, the Defendants, TINA KINOL and PAXTON KINOL (hereinafter "the Defendants") entered into a written Lease (hereinafter "the Lease") with the Plaintiff, GUY MAZZOLA (hereinafter "the Plaintiff"), for the use and occupancy of the premises located at 106 Briscoe Road, New Canaan, CT 06840 (hereinafter the "Premises") at a monthly rent of \$5,500.00 payable on or before the first day of each calendar month, starting July 1, 2018.

~~2. The Defendants took possession of the Premises pursuant to said Lease.~~

3. The Defendants' right to have possession of the Premises has terminated because of serious nuisance as defined in Section 47a-15 of the Connecticut General Statutes. More specifically, on September 25, 2020 both Defendants were arrested and charged with a Class C Felony – Risk of Injury to a Child in violation of CGS 53-21 and which conduct presents an immediate and serious danger to the safety of the other tenants.

4. On November 6, 2020, the Plaintiff caused a notice to be duly served on the Defendants to quit possession of the Premises on or before November 11, 2020. A copy of said notice is attached hereto and made a part hereof and marked Exhibit A.

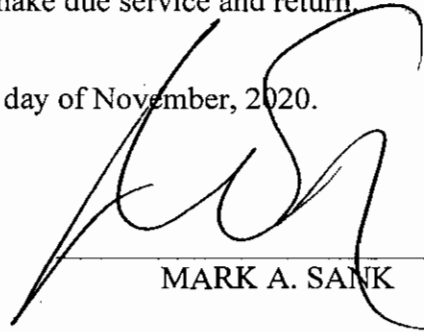
5. Although the time designated in the notice for the Defendants to quit possession of the Premises has passed, said Defendants still continue in possession.

WHEREFORE, the Plaintiff claims a judgment for possession of the premises.

I, MARK A. SANK, the subscribing authority, hereby certify that I have personal knowledge as to the financial responsibility of the Plaintiff and deem it sufficient to pay the costs in this action.

Of this Writ, with your doings thereon, make due service and return.

Dated at Stamford, Connecticut this 16th day of November, 2020.



MARK A. SANK

Please enter the appearance of:

MARK SANK & ASSOCIATES, LLC
666 Glenbrook Road
Stamford, CT 06906
203-967-1190
Juris # 421741

For the Plaintiff

EXHIBIT A

NOTICE TO QUIT

To: **TINA KINOL
PAXTON KINOL
106 BRISCOE ROAD
NEW CANAAN, CT 06840**

I hereby give you notice that you are to quit possession of the premises located at **106 BRISCOE ROAD, NEW CANAAN, CT 06840** now occupied by you, on or before November 11, 2020, for the following reasons:

Serious Nuisance as defined in section 47a-15 of the Connecticut General Statutes.

All payments tendered after service of this Notice to Quit will be accepted as use and occupancy, attorney's fees and costs without waiving any rights to proceed with an eviction action.

Dated at Stamford, Connecticut this 6th day of November, 2020

GUY MAZZOLA

By: 

MARK A. SANK
HIS ATTORNEY

STATE OF CONNECTICUT

ss: New Canaan

COUNTY OF FAIRFIELD

11/6/2020

Then and there by virtue of the original Notice to Quit with Declaration in English and Spanish, I made service upon the within named Defendant(s):

TINA KINOL
PAXTON KINOL

On 11/6/2020, I made service on the Defendant PAXTON KINOL by leaving a true and attested copy of the original Notice to Quit with Declaration in English and Spanish, with my doing thereon endorsed, in the hands of PAXTON KINOL at 106 Briscoe Road, New Canaan, CT.

On 11/6/2020, I made service on the Defendant TINA KINOL by leaving a true and attested copy of the original Notice to Quit with Declaration in English and Spanish, with my doing thereon endorsed, at usual place of abode of TINA KINOL at 106 Briscoe Road, New Canaan, CT.

(2 COPIES SERVED)

The within and foregoing is the original Notice to Quit with Declaration in English and Spanish, with my doings thereon endorsed.

Fees:		
Process:	\$	60.00
Travel:	\$	15.00
Copies:	\$	2.00
Endorsements	\$	<u>1.20</u>
TOTAL:	\$	78.20

ATTEST:



Alan M. Freedman
Connecticut State Marshal